

EPA FOIA Request  
November 24, 2014

On November 7, 2014 the Department of Justice lodged a proposed Consent Decree with the United States District Court for the District of Oregon in the lawsuit entitled United States v. Linnton Plywood Association, Civil Action No. 3:14-1772. The United States' complaint in the case on behalf of the Environmental Protection Agency (EPA), the Department of Interior (DOI) and the National Oceanic and Atmospheric Administration (NOAA), United States Department of Commerce, seeks recovery of costs that the United States has incurred and will incur in responding to, and natural resource damages resulting from, releases or threatened releases of hazardous substances at the Portland Harbor Superfund Site in Portland, Oregon, pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act.

I am requesting all public records regarding, reflecting, identifying, concerning, referring to, dealing with, or in any way pertaining to the proposed Consent Decree referenced above. Such public records, include but are not limited to, the following: Correspondence between EPA and Linnton Plywood Association (LPA), etc.; LPA's Financial Information, as defined in the proposed Consent Decree referenced above and identified in Appendix A of the same, including, but not limited to, all the documents identified in Appendix A which comprise said Financial Information; LPA's Insurance Information, as defined in the proposed Consent Decree referenced above and identified in Appendix B of the same, including, but not limited to, all the documents identified in Appendix B which comprise said Insurance Information and including the insurance policies enumerated therein and any others subsequently identified that would qualify as Insurance Policies as defined under the proposed Consent Decree; and documents, records, or correspondence regarding, reflecting, identifying, concerning, referring to, dealing with, or in any way pertaining to the sale of LPA's Property identified in the proposed Consent Decree to Linnton Water Credits, LLC or to any other person or entity as specified in the proposed Consent Decree, including, but not limited to, all the documents identified in Appendix C of the same.